

APPEARANCES

For the Plaintiff:

MARSHA CHIEN
OFFICE OF THE ATTORNEY GENERAL
800 Fifth Avenue 2000
Seattle, Washington 98164-1338
206.464.7744
marsha.chien@atg.wa.gov

For the Defendant:

KRISTIN ASAI
Holland & Knight
111 SW 5th Avenue Suite 2300
Portland, Oregon, United States 97204.
503.517.2948
Kristin.Asai@hklaw.com



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Tacoma, Washington; June 27, 2019

9:54 a.m.

--oOo--

IOLANI MENZA,

sworn as a witness by the certified court reporter,

testified as follows:

E X A M I N A T I O N

BY MS. CHIEN:

Q. Can you say your name for the record?

A. Iolani Menza.

Q. Iolani Menza, that will help me be able to pronounce it correctly. My name is Marsha Chien. I represent the State of Washington. And we're about to take your deposition. And is there anything that would cause you concern that you wouldn't be able to my questions accurately?

A. No.

Q. Have you had your deposition taken before?

A. I was in court once. I've never been in a room like this.

Q. With a court reporter or anything like that? You've never been in a room with a court reporter --

A. No.



1 A. Unless they didn't want to come down.

2 Q. What about the barbers? Are those detainees?

3 A. Yeah.

4 Q. So detainee workers are the barbers that cut

5 other detainees' hair; is that right?

6 A. Yeah.

7 Q. How many barbers are there?

8 A. It just depended.

9 Q. How many were assigned on a given day?

10 A. I couldn't tell you exactly. It's just

11 usually who showed up.

12 Q. Did you have a list of potential barbers,

13 barbers who are detainees, who might show up?

14 A. Yes.

15 Q. Who gave you that list?

16 A. Nobody gave me. It was there.

17 Q. Do you know which department was responsible

18 for making sure that --

19 A. Classification should be responsible for all

20 the detainees' jobs.

21 Q. Were there times when there were -- were there

22 times when there weren't enough barbers for the number

23 of detainees who needed haircuts?

24 A. Repeat the question.

25 Q. Were there times when there weren't enough



1 barbers, given the number of detainees who needed
2 haircuts?

3 A. So the -- I don't understand 'cause I've never
4 not gotten everybody who wanted a haircut done.

5 Q. So they might just have to wait in line if
6 there's only one detainee barber?

7 A. Yeah.

8 Q. What happens if you have your list of detainee
9 barbers and they've all been booked out? How do -- you
10 what happens then?

11 A. Volunteers, ask for volunteers to cut hair.

12 Q. Who asks? How do you replace that list?

13 MS. ASAI: Object to the form.

14 A. I've never replaced the list.

15 Q (By Ms. Chien) Let me back up. So if you
16 have, like, a list of -- I'm going to say five detainee
17 barbers.

18 A. Okay.

19 Q. And you had testified that, you know,
20 detainees, whoever comes down, will be the barber for
21 that day, right, of that list of five; is that right?

22 A. (Nodding.)

23 Q. Let's say nobody comes down for, like, three
24 days. No detainee barber comes down. How do you get
25 more detainee barbers?



1 Q. Is it also three to four detainees?

2 A. I don't know.

3 Q. Did you ask for three to four detainee
4 workers? Or was that assigned to you?

5 A. I . . .

6 MS. ASAI: Object to the form.

7 A. I didn't ask for anything specific. So just,
8 if they were allowed to come, they would come. You know
9 what I mean? I didn't ask for any number of detainees
10 to come or anything like that.

11 Q (By Ms. Chien) Let me back up actually. So
12 there's detainee workers that work in the laundry; is
13 that right?

14 A. Yes.

15 Q. Who was allowed to work in the laundry as a
16 detainee? Were you provided a list?

17 A. Yes.

18 Q. How many detainees are on that list for a
19 given shift?

20 A. So without seeing the list, I don't know
21 exactly how many. We -- I generally have four detainees
22 that I would call down.

23 Q. When your shift started, would you have to
24 call the pod and ask for those four detainees?

25 A. Not normally, no.



1 Q. How does it normally work?

2 A. They are day-shift workers. So they would
3 come down 'cause they knew they would come down. I knew
4 they would come down and help out with the laundry. And
5 if they didn't come down, I would call the pod and see
6 why they didn't come down. And so, if they just didn't
7 feel like coming that day, that was fine. And then I
8 might call an alternate. But normally three is fine.

9 Q. Okay. Could you work with no detainee
10 workers? Could you do it all without any detainee
11 workers?

12 MS. ASAI: Object to the form.

13 A. I can work 'cause it was my job, yeah.

14 Q (By Ms. Chien) You had mentioned that you
15 would complete laundry for a pod in one day, in one
16 shift; is that right?

17 A. Yes.

18 Q. Could you do that if you were the only person
19 working in the laundry?

20 A. I don't know. I've never done it by myself.

21 Q. What was the least amount of detainee workers
22 that you've had in the laundry for a shift?

23 A. One.

24 Q. How did the work change when you had only one
25 detainee worker as opposed to three?



1 A. Yeah.

2 Q. But then there were also new detainee workers
3 that came on while you were laundry officer; is that
4 right?

5 A. Yes.

6 Q. How did you get those new detainee workers?

7 A. I had a list of individuals that were on the
8 standby waiting list. I called their officer at the pod
9 they stayed in and had their officer ask them if they
10 would like to work with me in the laundry room. They
11 either said yes or no.

12 Q. Did you ever get to choose which detainee
13 workers you would prefer to work in the laundry?

14 A. The process is the way I called for workers.
15 I never chose.

16 Q. Did you have any preferences? Like if you
17 could choose, were there some detainee workers that were
18 better than others?

19 A. I would just go by the list. So . . .

20 Q. I mean about their work product, how they
21 worked. They all worked the same?

22 A. No. They -- everybody has different
23 personalities. Everybody is different. As long as they
24 got the job done, that's fine with me.

25 Q. Did you ever have to call classification to



1 the list of emails. Do you see that?

2 A. So what was the question?

3 Q. I just wanted to get you to that spot on the
4 page. It says: "The laundry officers do the hiring."
5 Do you see that?

6 A. I see it says that in this email.

7 Q. Do you think that's accurate?

8 A. So its his interpretation of hiring is not
9 mine. Mine is I go off the list based on what I'm
10 provided. So I'm given a list. That's who's next.

11 Q. Later it says: "Day shift received approval
12 to hire ML and MH detainees only." What does that mean?
13 Do you know, "ML and MH detainees"?

14 A. I do.

15 MS. ASAI: Object to the form.

16 Q (By Ms. Chien) What does it mean?

17 A. So ML is a classification, and MH is a
18 classification.

19 Q. Got it. Have you ever heard of the term
20 "OSHA"?

21 A. Yes.

22 Q. What does it mean to you?

23 A. Government safety . . .

24 Q. Is it about workplace safety?

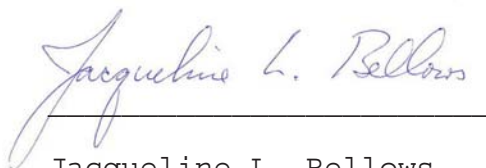
25 A. (Shrugs.) Govern the safety.



REPORTER'S CERTIFICATE

I, JACQUELINE L. BELLOWS, the undersigned
Certified Court Reporter pursuant to RCW 5.28.010 authorized
to administer oaths and affirmations in and for the State of
Washington, do hereby certify that the sworn testimony
and/or proceedings, a transcript of which is attached, was
given before me at the time and place stated therein; that
any and/or all witness(es) were duly sworn to testify to the
truth; that the sworn testimony and/or proceedings were by
me stenographically recorded and transcribed under my
supervision, to the best of my ability; that the foregoing
transcript contains a full, true, and accurate record of all
the sworn testimony and/or proceedings given and occurring
at the time and place stated in the transcript; that a
review of which was requested; that I am in no way related
to any party to the matter, nor to any counsel, nor do I
have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this 1st
day of July, 2019.



Jacqueline L. Bellows
Washington State Certified Court Reporter, No. 2297
jbellows@yomreporting.com

